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Attorneys for Debtor  
Southern Inyo Healthcare District

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

In re  
SOUTHERN INYO HEALTHCARE  
DISTRICT,  
Debtor.

Case No. 1:16-bk-10015-FEC  
Chapter 9  
WGG-5

STIPULATION TO CONTINUE THE  
HEARING ON SECOND AMENDED  
DEBTOR'S MOTION FOR ORDER  
ESTIMATING CONTINGENT OR  
UNLIQUIDATED CLAIMS UNDER 11  
U.S.C. SECTION 502(c)

Current Hearing Date:  
Date: December 17, 2019  
Time: 9:00 a.m.  
Place: 501 I. Street  
Sacramento, CA  
Courtroom 28

Weiland Golden Goodrich LLP  
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1 **TO THE HONORABLE FREDRICK E. CLEMENT, UNITED STATES BANKRUPTCY**  
2 **JUDGE, AND ALL OTHER INTERESTED PARTIES:**

3 Southern Inyo Healthcare District ("District"), Healthcare Conglomerate Associates,  
4 LLC ("HCCA"), and Vi Healthcare Finance, Inc. ("Vi," collectively with the District and  
5 HCCA, the "Parties") by and through their undersigned counsel, submit this Stipulation to  
6 Continue the Hearing on the Second Amended Debtor's Motion for Order Estimating  
7 Contingent or Unliquidated Claims Under 11 U.S.C. Section 502(c) ("Stipulation").

8 **RECITALS**

9 A. The District filed a chapter 9 bankruptcy petition in this district, commencing  
10 case number 1:16-bk-10015-FEC, on January 4, 2016. An Order for Relief Under Chapter  
11 9 was issued by the Court on July 12, 2016.

12 B. On October 22, 2019, the District filed its Second Amended Debtor's Motion  
13 for Order Estimating Contingent or Unliquidated Claims Under 11 U.S.C. Section 502(c)  
14 ("Motion").

15 C. On October 30, 2019, HCCA and Vi filed an application to continue the  
16 hearing on the Motion ("Application to Continue"). The Application to Continue was  
17 approved by order entered on October 31, 2019, and the hearing on the Motion was  
18 continued to December 17, 2019 at 9:00 a.m.

19 D. The Parties have reached a settlement of all of their disputes, including the  
20 Motion, and are in the process of documenting that settlement. In order to provide time to  
21 have that settlement documented, the Parties have agreed to continue the hearing on the  
22 Motion for 60 days to conserve time and resources of the Parties and the Court.

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**STIPULATION**

Based upon the foregoing recitals, and subject to Bankruptcy Court approval, the Parties hereby stipulate:

1. Continue the hearing on the Motion for approximately 60 days to a date and time convenient to the Court; and

2. If prior to the continued hearing date the settlement falls apart, the Parties may request the advancement of the hearing on the Motion.

**IT IS SO STIPULATED.**

Dated: November 20, 2019

WEILAND GOLDEN GOODRICH LLP

By: /s/ Jeffrey I. Golden  
JEFFREY I. GOLDEN  
Attorneys for Debtor  
Southern Inyo Healthcare District

Dated: November 20, 2019

WANGER JONES HELSEY PC

By:   
OLIVER W. WANGER  
Attorneys for Healthcare  
Conglomerate Associates, LLC and  
Vi Healthcare Finance